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6                   UNITED STATES DISTRICT COURT  
7                   WESTERN DISTRICT OF WASHINGTON  
8                   AT SEATTLE

9 GREAT AMERICAN E & S INSURANCE  
10 COMPANY, INDIVIDUALLY, AND AS  
11 ASSIGNEE OF CLAIMS FROM ITS  
12 INSURED C3 MANUFACTURING LLC, A  
13 COLORADO COMPANY,

14                   Plaintiff,

15                   v.

16 HOUSTON CASUALTY COMPANY,  
17 GORDON REES SCULLY MANSUKHANI,  
18 LLP, SINARS SLOWIKOWSKI TOMASAKA  
19 LLC, J. SCOTT WOOD and CHRISTOPHER  
20 FURMAN,

21                   Defendants.

22  
23                   Case No. 2:23-CV-01695

24                   DECLARATION OF STEVEN P. CAPLOW  
IN SUPPORT OF NOTICE OF REMOVAL

25 Steven P. Caplow declares:

26                   1. I am an attorney at Davis Wright Tremaine LLP and counsel of record for Defendant  
27 Houston Casualty Company (“HCC”) in this action. I submit this declaration in support of HCC’s  
28 Notice of Removal based on my review of the files and records in this case. I am over 18 years of  
29 age and in all other ways competent to testify to the facts in this declaration.

2. Attached as **Exhibit A** is a true and correct copy of the Summons filed in King County Superior Court on September 5, 2023.

3. Attached as **Exhibit B** is a true and correct copy of the Case Information Cover Sheet filed in King County Superior Court on September 5, 2023.

4. Attached as **Exhibit C** is a true and correct copy of the Complaint filed in King County Superior Court on September 5, 2023.

5. Attached as **Exhibit D** is a true and correct copy of the Order Setting Civil Case Schedule issued by the King County Superior Court on September 5, 2023.

6. My firm has conducted a reasonable inquiry into the citizenship of Great American E & S Insurance Company (“GAES”). GAES alleges in its complaint that it is an Ohio corporation with its principal place of business in Cincinnati, Ohio.

7. HCC is a corporation incorporated under the laws of Texas with its principal place of business in Houston, Texas.

8. No earlier than November 6, 2023, a copy of the Summons and Complaint was delivered to HCC's registered business address.

I declare the foregoing is true and correct to the best of my knowledge under penalty of perjury.

SIGNED at Seattle, Washington this 6<sup>th</sup> day of November, 2023.

s/ Steven P. Caplow  
Steven P. Caplow, WSBA #19843  
[stevencaplow@dwt.com](mailto:stevencaplow@dwt.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that on 6<sup>th</sup> day of November, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below attorney of record for plaintiff.

Mark Johnson, WSBA No. 8463  
Michael Sprangers, WSBA No. 45501  
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Attorneys for Great American E & S Insurance Company

DATED this 6<sup>th</sup> day of November, 2023.

By s/Everett W. Jack, Jr.  
Everett W. Jack, WSBA No. 47076  
Steven P. Caplow, WSBA No. 19843